

Deaf Education Reform Recommendations

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Background

The Idaho State Board of Education and other policymakers are evaluating ways to improve education for deaf and hard-of-hearing students. We support efforts to ensure that students receive high quality education programs and services statewide. Because students have unique and diverse educational needs, careful consideration must be given to any proposed delivery model.

According to the Office of Performance Evaluations' 2005 report, "any significant changes should be accompanied by detailed analyses of how well students will be served, fiscal tradeoffs, facility use, and logistical constraints."¹ We believe that decision-makers will benefit from a thorough analysis of these issues prior to making long-lasting decisions. Accordingly, this paper serves to explain the implications of the proposed "decentralized regional service delivery model" and outline alternative recommendations.

The Decentralized Regional Delivery Concept

In the 2006 legislative session, the House Education Committee considered a bill that would dissolve a state agency known as the Idaho School for the Deaf and the Blind (ISDB). ISDB's budget would be dispersed to five or six Host districts. Each Host would assume responsibility to educate deaf and hard-of-hearing children living in surrounding areas. Money would be divided on a per-pupil basis.

Under the purview of the State Board, a Division of Deaf Education would assist the Host districts in fulfilling their new responsibilities.

Although the bill failed in committee by a vote of 16 to 1, the State Board has chosen to use the bill as a template for its preferred delivery model moving forward. The decentralized regional concept appeals to many people because it claims to be able to replicate a high caliber program around the state five times over without a significant budget increase. At the core of this idea is the mantra that students will be able to live at home and commute daily only a short distance to a program with the same level of service they now enjoy at ISDB.

The premise behind the idea is magnanimous. One can understand how, on the surface, such an approach would appeal to individuals who do not have experience in educating deaf children. However, the feasibility of the model is totally impractical in this state primarily due to a small population of deaf students. In addition, budget constraints, geographical barriers, and lack of qualified deaf education professionals present other complications.

Implications of a Decentralized Model

Number of Students. Some states with large numbers of deaf students have multiple schools for the deaf as well as extensive regional magnet programs. Because of certain state's sizeable populations, they can create critical masses of students in many locations. For example, the California School for the Deaf in Riverside currently enrolls 450 deaf students. Only 42 miles away, the Irvine School District enrolls 170 deaf students in a regional magnet program.

Compare these numbers to Idaho. Only 150 signing deaf children live in the entire state. About forty-five of them attend ISDB in Gooding (this includes signing students with special needs). The rest are educated in their local schools or in seven existing regional magnet programs (Coeur d'Alene, Moscow, Lewiston, Emmett, Meridian, Boise, Pocatello). As a bare minimum, a critical mass of same-language deaf peers is considered to be no less than 40 students ages 13-21. Clearly, given the small numbers of deaf students in our state, the idea that multiple critical masses of students can be created in five or six regions around Idaho is impossible.

There is a temptation to include all deaf and hard-of-hearing students into the same formula in aggregate format without respect to their functional levels, language preferences, or social/emotional needs. This approach is used at times but it has severe drawbacks. It is a misleading and harmful practice with respect to creating policies and programs on a state level.

There are 450 identified hard-of-hearing students and 180 signing and cochlear implant (CI) deaf students in Idaho. If one includes both populations into the same formula, it appears as though there are over 600 students who could be divided up into six programs. This creates the striking illusion that each regional

program could have a critical mass of 75-100 students. However, this line of reasoning is significantly flawed because deaf students have entirely different educational needs than hard-of-hearing students. The two populations must be considered separately.

Budget Constraints. Replicating a program similar to ISDB six times over would result in an enormous budget increase. In order to operate a program with a critical mass of students, a minimum amount of infrastructure must be in place, e.g., facilities, personnel, administrative support, etc. As programs are replicated, so is overhead. Increased overhead ultimately results in fewer direct services to students. If policymakers intend to disperse today's 8.1-million-dollar budget across six programs, they can expect to have 1/6 of the quality in each program. Economy of scale and scope cannot be ignored.

Geographical Barriers. Given Idaho's large rural geography, it is neither practical nor desirable that students consume a great deal of their time each day commuting to and from a regional program. Even if six programs were established in population centers around the state, there would be many students who could not enroll because they live too far away.

Further, parents would not likely be enthused about a long commute to a program that had a meager amount of same-language peers with whom their child could interact. The most likely fallout would be that students living outside of commuting distance would end up not attending the regional programs—this would cause further isolation in their home districts. At the present time, students in this predicament have the option of commuting weekly to the residential program at ISDB. This not only provides students with a rich academic and social experience, but it also ensures that the State complies with IDEA in offering a full spectrum of placement options.

Lack of Qualified Professionals. In the final analysis, the lack of qualified professionals may be the most colossal obstacle to a successful decentralized delivery model in Idaho. We simply do not have enough teachers and interpreters to meet the demand. Idaho's current deaf education delivery model is considered to be one of the most decentralized models in the U.S. already. Decentralizing services even more than they are today magnifies the problem of recruiting and retaining qualified personnel. ISDB has had serious problems in the past few years retaining staff and turnover has been an issue. If ISDB cannot currently recruit and retain enough highly qualified teachers to provide direct instruction, how could six Host districts around the state have any better luck?

Some argue that if districts had more money to recruit teachers and interpreters, they would be able to attract them with much greater ease. In other words, there is a common misperception that the only reason districts cannot find qualified personnel is because "all the money is tied up at ISDB," leaving little money for

the districts to use for recruiting. This is naïve thinking and it is not based on fact and research.

For example, not even the Meridian School District—one of the state’s most well-funded districts in a densely populated area—can recruit and retain enough qualified interpreters and highly qualified teachers to meet the demand. If Meridian cannot do it, how can we expect smaller rural districts to do it? More money for recruiting is not a magic bullet to solve the supply and demand problem. There is a national shortage of qualified teachers and this is part of our problem.

Aside from money, new laws make it more difficult to employ deaf education professionals nowadays. For example, in 2006, the 58th Idaho Legislature passed a law that requires K-12 interpreters and transliterators to pass performance examinations to get a job. The federal No Child Left Behind Act creates similar challenges for teachers to become highly qualified. Lastly, Idaho’s current certification rules prevent speech pathologists with a masters in deaf education from becoming certified auditory-oral teachers of the deaf—this means that we cannot “home grow” auditory-oral teachers of the deaf in our state.

In summary, Idaho’s small number of deaf students is the primary problem, but budget constraints, geographical barriers, and dearth of qualified professionals also make the fracturing of Idaho’s current model an unviable and unwise plan. While the idea to decentralize services even more than they are today may appear attractive on the surface to some, it is impossible to do so with the high level of quality that families expect and deserve.

We recognize that in the current delivery model there are strengths and weaknesses. In modifying this system, we need to strengthen rather than weaken the system to ensure that each of the five deaf and hard-of-hearing student populations are well served or have the option to be well served.

There are five major categories of deaf and hard-of-hearing students in Idaho with unique and diverse educational needs:

1. Signing students in local schools or with some support from magnet programs are receiving mediated instruction through interpreters in a regular education setting and may have some support of a deaf education teacher; These programs are fine for younger children who can live at home. But, if these students are older they are generally at a disadvantage in that their education is dependent on the quality of interpreting and their social and family interactions are dependent on high quality signing which rarely is present in these environments. Most of these older 13-21 age students nationwide receive a Level I education which is not acceptable and can only be acceptable if the student is unusually gifted.

2. Auditory-oral students in specialized oral programs or local schools receiving direct instruction from qualified auditory-oral teachers of the deaf; This education can be adequate if there are high quality instructors possessing extensive experience with younger students or if children make exemplary progress and can in later years be mainstreamed with little assistance in the local school.
3. Hard-of-hearing students in local schools receiving regular education instruction with pull-out audiology and/or speech services; 3/4 of hard of hearing students do not currently have such services.
4. Signing deaf or near deaf students who sign and are in a specialized school for the deaf receiving direct instruction from certified teachers of the deaf with a critical mass of same-language peers; such instruction may be adequate at a Level II or III or at a comprehensive Level IV depending on the number students and the size of the staff; and
5. Students with multiple disabilities in any of the above four settings. These students often need their own aides and, in the case of deaf/blind they need multiple experts.

The Numbers within a Decentralized Regional Context

As noted above, Idaho already has a largely decentralized delivery model with seven existing regional magnet programs. These magnet programs and local schools currently serve more than half of the deaf students in the state (primarily the younger children). We expect that even with regional programs in two locations they will continue to serve about 50-60 children. The analysis below is intended to be an exercise in practicality within the context of the State Board's desire to decentralize our current model even further.

As noted above and in the section below, there will be reference to Level I, II, III, and IV programs, so each level is defined here:

Level IV: Comprehensive: all services are provided to meet the highest standards

Level III: Acceptable: key services are provided to meet essential standards and the program size is larger and therefore more acceptable than Level II.

Level II: Acceptable: key services are provided to meet essential standards

Level I: Unacceptable: services provided cannot meet essential standards unless the child is gifted or there is some compensating factor. The environment itself is deficient.

Option 1: Two Center-based Programs – Magic & Treasure Valleys

If the State Board decides to create regional center-based programs, there would in reality only be two: one in Treasure Valley [i.e., the Treasure Valley] (60 signing deaf students) and one in Magic Valley (40 signing deaf students). In both locations major funds would be needed for physical facilities in a central location to serve these 100 students from the statewide 150 students who sign primarily.

After the physical facilities are provided, a funding formula for the students in these two programs would probably fund children in these two regions and the remaining 50 at other locations throughout the state at the same level. Signing deaf students in Treasure Valley who elect to stay in the four existing magnet programs would need to be funded at somewhere near the same level also and would reduce the total number from 60. Realistic plans for these two regional programs (option 1) are listed below.

Residential provisions will be needed for a few students in this program from the beginning and more accommodations will be needed as more and more children want to come to the best program in the state.

Treasure Valley Center-based Program. There are about 60 signing students in the Treasure Valley ages 0-21. About 36 of these children are 0-12; about 24 are 13-21.

We estimate there will be fewer than 1/3, or 10-12, of the 36 younger children who would initially join the central program. This means there would be three elementary classrooms serving older and younger elementary children (three classes of 4-5) at the K-12 program. The others we expect to stay in their current programs. Parents will have to be willing to leave nearby programs where they are presently served and we expect resistance in some cases.

Three elementary teachers are needed with signing skills and 2-4 aides, depending on the number with special needs.

Five full-time certified teachers of the deaf would probably staff the needs for the older children, ages 13-21: Language, Math, Science, Social Studies, Drama.

The 24 older (13-21 age) students would be rotated through the classes through the school day, grouped in two advanced and three average groups. Teachers would see five classes per day. Students could also be mainstreamed for PE and some vocational classes. There would be 10-20 additional interpreters—above what the market has currently—needed for this mainstreaming.

This size of a program would not, at first, make it possible for it to be a Level IV comprehensive program (the program here would be a Level III program). The presence of 24 students in this central program assumes that all the 13-21 age

children will be in the program. In reality some of the students will probably elect to stay in their current magnet or local programs. In that case, the program would be less robust than described. However, we anticipate the program would grow some over time as families of the deaf in Idaho realize it is the best program in the state.

Magic Valley Center-based Program. A near exact replica of the program above would be needed in the Magic Valley. However, the total number of students there is only about 40. Competing magnet programs do not exist in the Magic Valley, so the students will all probably be in the K-12 program.

We estimate all of these children will initially join the central program. This means there will be four elementary classrooms serving children at the K-12 program.

Four elementary teachers are needed with signing skills along with 2-4 aides, depending on the number with special needs.

For this size program you would not at first, or probably ever, have a Type IV comprehensive program (this smaller Magic Valley program would be considered a Type II program with smaller classes than Treasure Valley for older children). Five full-time certified teachers of the deaf would probably staff the needs for 13-21 age children: Language, Math, Science, Social Studies, Drama.

The 16 students would be rotated through the classes through the school day, grouped in two advanced and two average groups. Teachers would see four classes per day. Students could be mainstreamed for PE and some vocational classes. There would be 10-15 additional interpreters—above what the market has currently—needed for this mainstreaming.

Table 1: Personnel Requirements for Option 1

Projected Enrollment
2007-2008

Administrative
Services: Director
Curriculum Specialist
Assessment Specialist

Elementary Classes & Teachers

Secondary Classes & Teachers

Support Personnel:

TV

Ages

0-3=8 Outreach

4-5=7-?

6-7=7-?

8-9=7-?

10-12=7

Total=36 in

Ages 4-12

13-14=8

15-16=7

17-21=9

One

One

One

Three

Five

Language

Math

Science

Soc Studies

Drama

Two Secretaries

2-4 aides

10-20 Interpreters

MV

Ages

0-3=5 outreach

4-5=5

6-7=5

8-9=5

10-12=5

13-14=5

15-16=5

17-21=6

One

One

One

Four

Five

Language

Math

Science
Soc Studies
Drama
Two Secretaries

2-4 aides

10-15 Interpreters

Media Sp.
Audiologist
SLP

A “Treasure Valley Day School for the Deaf,” with a residential component, functioning as a K-12 program, would in many ways become the state’s “new” state school for the deaf (at a Level III). The ‘agent’ that provides the services and facilities for students on a K-12 basis or on a 7th-through 12th- grade basis could be Meridian School District. This ‘day school’ would need to provide some residential services and it could provide a ‘campus like’ environment with after school activities. Rather than also having a weaker (Level II) program in the Magic Valley, Option 2 below would be preferable because it would have a greater number of students, classes and teachers and could move the program to a Level IV. Other services and a fully comprehensive program could be provided. See Appendix I for a description of program Levels I, II, III, IV.

Option 2: One Center-based Program in the Treasure Valley

Under these circumstances the program would probably need a magnet school in Magic Valley for the 24 younger children and that program would look just like the one shown above for the younger children in Magic Valley. The Treasure Valley program for birth-12 students would look the same also.

We estimate there will be only up to about 1/3, or 10-12, of these younger children who would initially join the central program. This means there will be three elementary classrooms serving older and younger elementary children at the K-12 program. The others we expect to stay in their current programs.

Three elementary teachers are needed with signing skills and 2-4 aides depending on the number with special needs.

With 40 older 13-21 age students from both valleys in this program we could have what is considered a comprehensive program with a critical mass. Six teachers could be hired to meet the needs for these children: Reading, Writing, Math, Science, Social Studies, and Drama.

The 40 students would be rotated through the classes through the school day, grouped in three advanced and three average groups. Teachers would see six classes per day. The curriculum could be richer so you could have one more teacher. The program could have both literature (reading) classes and writing classes. Students could also have a PE and some vocational classes within the school. If they are mainstreamed, some interpreters would be needed but reverse mainstreaming might occur if the staff is big enough.

If all 40 students (ages 13-21) were in one location, we would have a critical mass in Idaho. Students could socialize and have sports programs. They would have a richer curriculum. Fewer than 40 students might at first be present with some students staying in their local district/magnet programs.

Table 2: Personnel Requirements for Option 2

Projected Enrollment

2007-2008

Administrative

Services: Director

Curriculum Specialist

Assessment Specialist

Elementary Classes & Teachers

Secondary Classes & Teachers

Support Personnel:

TV

Ages

0-3=8 Outreach

4-5=7-?

6-7=7-?

8-9=7-?

10-12=7?

Total=28 in

Ages 4-9

13-14=13

15-16=13

17-21=14

One

One

One

Three

6-7---

Reading

Writing

Math

Science

SocStudies

Drama

PE/Health

Secretary

2-4 aides

___ Interpreters

MV

Ages

0-3=5 Outreach

4-5=5

6-7=5

8-9=5

10-12=5

One

Three

1-3 aides

Additional staff beyond teachers

If there were two regional programs, each would need the following administrative staff:

Principal

Curriculum/instruction director

Assessment/psychologist

If there were one program, we would need only three administrative staff instead of six:

If there was one center-based program which grows over time, we could also hire in time the following positions:

PE/Health teacher

Vocational teacher

Media Specialist

SLP

Audiologist

With two programs, we would need all these services in both locations, but it would not be a full-time job and the students would possibly need mainstreaming and interpreters. These are some of the reasons that putting both programs in one location would produce a comprehensive (Level IV) program.

If not in one location, both programs will be less than comprehensive. Treasure Valley would be rated Level III and Magic Valley would be rated Level II. All the other magnet programs in the state will be Level I programs. With respect to standards, deaf education experts consider Level I programs to be unacceptable unless a child is gifted—See Appendix I). If the current ISDB program is split into two regions there will be no comprehensive program in the state and only the two regional programs are feasible. This is a simple function of deaf population. We cannot create a Level II or III program with fewer than about 16 older 13-21 signing deaf students.

As shown in Appendix 3, it is not feasible to have a central 13-21 age program in any of the other four regions because the number of signing students of that age is 8 in Idaho Falls, 5 around Pocatello, 7 near Lewiston and 1 near Couer d Alene. These numbers may change a bit from year to year, but probably will decrease if anything as cochlear implants become more common. You cannot create a reasonable deaf class situation for 4 classes with numbers like this and besides, some of these children would likely stay in their magnate school and not go to the central program. The only strategy for these children then, is mainstreaming which, in general, is an unacceptable solution for a signing deaf student. Most average interpreters can only sign about 60% of what a non-signing teacher will say. That is not an ideal learning situation.

Deaf education experts predict that to begin with a few (and over time, many more) students/ parents will require the state to send their child to the best program in the state, the one in Treasure Valley. It will gradually grow larger and staff will need to be added until it will be a Level IV comprehensive program.

Magnet/LEA Programs

These programs would be primarily what they are now. They will have limited certified deaf education teachers and interpreter services and not have sufficient numbers to create even the Level II program that can be put into Magic Valley, which would require a staff of nine teachers, three administrators, and part-time help in media, SLP and Audiology. With 1-8 students ages 13-21, it simply would not be feasible to have the teachers and staff for a Level II program. There are only about 20 13-21 year old signing students outside of the two regions and if you divide that 4 ways you have only 5 students.

This magnet type of situation requires a skilled interpreter staff (above average) if it is to be successful with older 13-21 age children. Only gifted students with unusual family support can survive in this type of program. Some students/

families who choose this option voluntarily accept an unacceptable program. Whether state standards allow parents to continue to make this choice will be an issue because of no child left behind. Funding these programs with state money will help, but the main problem then will be the size of the signing deaf population in these smaller population areas, which will probably get even smaller in time due to the increasing popularity of cochlear implants. At some time there might be enough students by combining Pocatello and Idaho Falls, but this is not the case now and probably will not occur unless there is growth and the number of older signing students reaches about 20.

Outreach Program

The costs will remain about the same as they are now for the outreach programs, except space will be needed to house additional audiologists (for hard of hearing services) and they will need audiological equipment and cars to travel. There will also be some SLPs needed to serve hard-of-hearing students for districts without SLP services. There are many SLPs in Idaho who can perhaps be hired to provide the services, but it is anticipated audiologists will need to be hired since in remote areas there are simply no audiologists close by. The major hard of hearing services are considered later. Only major services for the younger birth-3 children are the main focus in the paragraph below which will be provided by outreach personnel.

We estimate there are about eight outreach birth-3 children in the Treasure Valley, five in Magic Valley, and seven or eight in the rest of the state. Whatever the outreach costs are currently is what it costs to provide these 20 deaf children services. The outreach program will continue to provide some limited services in coordination with audiologists and SLPs to hard-of-hearing students and to magnet deaf programs. Nevertheless, the great bulk of this cost is in connection with the birth-3 age children. In home services to birth-3 age children are crucial to help parents of these children. This service must continue even though it is costly.

Hard of Hearing Students

Unfortunately, only about 1/4 of the hard of hearing children in the state currently receive audiology services. Based on survey work done at Idaho State University (ISU) it is estimated that 2,500 children in the state are hard of hearing and need services. Seven districts have an audiologist who works for the district full or 1/2 time. These are in the largest districts so these seven serve 70,000 of the 255,000 school children in the state. About 1% of the children in a district will be hard of hearing so these audiologists are serving about 700 children.

Some hard of hearing children have greater needs than others so it is impractical to award a set amount per child. The best way to allocate this money is to hire

audiologists that are located with the regional programs in the six school district regions of the state. Audiologists will need to work with all the districts that do not currently have audiology services.

Screening will be needed each year and audiological monitoring of hearing throughout the year for those who do not pass the screening. Many districts currently provide screening services but then the followup is inadequate. ISU found that 4-5 times as many hard of hearing children are being served in districts with an audiologist as compared to those who do not have one.

The seven audiologists currently in the state are serving 70,000 children and 10,000 children served per audiologist is recommended by the national audiology association (ASHA). It appears then that 18 other audiologists will be needed. This would be approximately three audiologists per each of six regions.

Some of the districts currently contract for these audiology services, but as noted, these services tend to be strong on screening and weak on follow-up. If full services are provided, private audiologists could do some of this work. Without funding by the schools or the Division of Deaf/HH, however, the services will continue to be incomplete and ineffective, as they are now, with as few as 1/5 of the children who need it being served.

Since there are so many small districts in Idaho, we need to have a multi-district approach with each audiologist serving about 10,000 school children and they would eventually, after screening, focus their efforts on about 100 children each. If these children do not have access to an SLP in the district some of them will need those services. Since there are nearly 100 SLPs in the state working in the schools, the shortage is not nearly as acute as with audiologists.

Some formula needs to be devised so one audiologist can be hired per each 10,000 children. The Division of Deaf/HH needs to determine if it will help support the audiologists currently hired by the larger districts. Federal special education funds are currently being used to hire these audiologists, so it may be that all costs should not be reimbursed when audiologists are already in the school. SLP costs in most districts also come partly from federal funds.

Oral/Aural Students

About half of the children who are primarily oral/aural and do not sign have cochlear implants and are near Coeur d'Alene and in the Treasure Valley, where the two local implants centers are located. Currently we recommend four classrooms are needed for these children. This is because there are a larger number of younger students who continue to receive implants than previously. Also, some severely hard of hearing children might attend the elementary programs as audiologists identify these children and recommend them for special help. We

assume there should be two administrators (probably an associate administrator and someone skilled in curriculum/assessment housed at the Central program) who oversee these programs.

Special teachers are needed for the younger children in these programs and recruitment is a major issue. As the number of children with implants grows, more of these programs will be needed and 1-3 may be added in other regions over time. Most of these older children are mainstreamed and if doing well they can be served by central or LEA staff for audiology and speech pathology and other services.

Table 3: Personnel Requirements for Oral/Aural Programs

Projected Enrollment
2007-2008

Administrative
Services: Director
Curriculum Specialist
Assessment Specialist

Elementary Classes & Teachers

Secondary Classes & Teachers
Support Personnel:

TV
Ages
0-3=3 Outreach
4-5=2
6-7=2
8-9=2
10-11=2
12-13=2
14-15=2
16-21=2

One
1/2

1/2

Three

1-3 aides

CDL

Ages

0-3=3 Outreach

4-5=2

6-7=2

8-9=2

10-11=2

12-13=2

14-15=2

16-21=2

One

1-2 aides

Students with Special Needs

Special teachers are needed for multi-disabled students which might be served within any of the populations mentioned above. Deaf/blind students need visual education experts as well as deaf interpreting. All these students will need special aides when placed into other settings.

Costs

These are the costs estimated for the programs: One assumption made here is that salaries will need to be excellent for staff and teachers if we are going to be able to hire and retain the best quality personnel.

Cost for Central Administration (Housed in Boise)

Staff

Director

Assistant Director

Secretary

Director of Outreach

Accountant

Nursing

Other Staff

Annual Cost

Facilities/Equipment	\$500,000.00
Audiometers/other equipment	\$250,000.00
Misc.	
School Supplies	\$100,000.00
Cars for outreach staff/central staff/audiologist	\$300,000.00
Building Space rental for central staff in Boise	\$50,000.00
Building space/residential facilities rental for Treasure Valley programs	
	\$250,000.00
TOTAL COST FOR CENTRAL ADMINISTRATION	\$1,450,000.00

Cost for Regional or Central Programs

The total number of deaf teachers and administrators with signing skills, aids and interpreters needed would include the following:

Option 1-2 Regional

8 classrooms @ 250 sq. ft. per classroom, hallways, office space for interpreters, aids, etc. (250 sq ft) and restrooms for a total of

2,700 square feet. Administrative offices for 3 administrators, one office support staff member and common area for copier, etc. -

900 square feet. Total square footage is estimated to be at least 3,600 square feet in each location

Food service (Breakfast and Lunch)	\$30,000.00
Professional therapy	\$50,000.00
Rental Space Magic Valley	\$36,000.00
Rental Space Treasure Valley	\$50,000.00
6 Administrators @ \$100,000	\$600,000.00
10 Secondary Teachers	\$700,000.00
7 Elementary Teachers	\$490,000.00
20 interpreters	\$1,000,000.00
8 aids	

	\$400,000.00
Total Rent, materials, services	
	\$166,000.00
Total Personnel	
	\$3,190,000.00
TOTAL COST OPTION 1-2 REGIONAL	
	\$3,356,000.00

Option II-1

Food	\$30,000
Professional Therapy	\$50,000
Rental Space Magic Valley	\$20,000
Rental Space Treasure Valley	\$50,000
3 Administrators	\$300,000
7 Elementary Teachers	\$490,000
7 Secondary Teachers	\$490,000
10 Interpreters	\$500,000
8 aids	\$400,000
Total Rent, materials, services	
	\$150,000
Total Personnel	
	\$2,180,000
TOTAL COST OPTION II-1	
	\$2,330,000

Note: both of these options are based on the continuation of the other services needed:

- 1 Central Staff, equipment and supplies (See above) See 2-6 Below
2. Hard of hearing services for 2,500 students, i.e. new Audiology and SLP services for 3/4 of 2,500 students and support for those already served)
3. Oral/Aural programs and services (continue the current program and expand)
4. Current magnet/LEA programs (offer financial support to current programs)
5. Outreach program (continued current program)
6. Special needs coordination with the blind program (continue current program)

Cost for Hard of Hearing

18 x \$75,000 (salary plus fringe plus travel expenses for audiologists)	\$1,350,000.00
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Support to current or private audiologist hired by LEAs	\$200,000.00
New Office space with current regional programs	\$20,000.00
5 SLP support where districts don't have access to SLP (if any)	\$125,000.00
TOTAL COST FOR HARD OF HEARING	\$1,695,000.00
 Cost for Oral Aural	
4 teachers and 2 administrators plus fringe for 15 younger students	\$500,000
Support for 15 mainstreamed older children (\$1,000 per student)	\$15,000
TOTAL COST FOR ORAL AURAL	\$515,000
 Cost for Current Magnet/LEA Programs	
50-60 signing students to help LEAs hire staff (teachers/interpreters)	
The other 90-100 students will require \$1,500 to \$3,000 per child	\$150,000.00
TOTAL COST FOR CURRENT MAGNET/LEA PROGRAMS	\$150,000.00
 Cost for Outreach Program	
Cost of current program	\$2,500,000
TOTAL COST OF OUTREACH PROGRAM	\$2,500,000
 Cost for Special Needs Students	
Cost of aids/special teachers includes fringe (10 children)	\$500,000
TOTAL COST FOR SPECIAL NEEDS CHILDREN	\$500,000
 TOTAL COST OPTION 1	\$10,166,000.00
TOTAL COST OPTION II	\$9,140,000.00

Appendix 1

The state has to be very careful about supporting Level I programs (magnet programs) because in most cases these small programs cannot produce ideal or

even acceptable programs and accordingly, students will not meet standards when they graduate from such programs. See, for example, the standards for students when they graduate, in the way of communications skills, etc, at the California School for the Deaf. Only gifted students can survive in these programs.

In a state with a small population of deaf children (180 in Idaho counting signing and CI children) there are issues that transcend the power of any one school district and/or region. One example of this has to do with class size. In Wisconsin, they concluded that some of their programs were deficient because they were so far from the ideal in meeting the number of students needed in high school classrooms. There is widespread agreement in many state regulations that classes should never be smaller than 4 students.

Wisconsin An Evaluation: Wisconsin Educational Services Program for the Deaf and Hard of Hearing [Department of Public Instruction]

<http://www.legis.wisconsin.gov/lab/reports/06-3Full.pdf>

[1] Staffing model [Ideal]

[a] 4 students in classrooms for students with severe disabilities

[b] 6 students in elementary school classrooms

[c] 8 students in middle school classrooms

[d] 12 students in high school classrooms

[see page 20 of document]

[2] Staffing model [actual, 2005-2006]

[a] 3.3 [should be 4]

[b] 3.9 [should be 6]

[c] 6.9 [should be 8]

[d] 5.3 [should be 12]

Clearly, we cannot create an acceptable middle school or high school program in a region where we have fewer than 16 children ages 13-21.

Small classes will lead to a failure to meet standards. Programs and student outcomes can be viewed against the following kind of metric.

Level IV. Comprehensive: all services are provided to meet standards

Level III: Acceptable: key services are provided to meet essential standards and the program size is larger and therefore more acceptable than Level II.

Level II: Acceptable: key services are provided to meet essential standards

Level I: Unacceptable: services provided cannot meet essential standards unless the child is gifted or there is some compensating factor. The environment itself is deficient.

Major Documents Driving Deaf Education Reform

Primary Documents

The National Agenda: Moving Forward on Achieving Educational Equality for Deaf and Hard of Hearing Students [April, 2005]

[a] <http://www.ceasd.org/agenda/downloads/natl-agenda-2005-04.pdf>

[b] Goals:

[1] Early Identification and Intervention

[2] Communication, Language and Literacy

[3] Collaborative Partnerships

[4] Accountability, High Stakes Testing and Standards Based Environments

[5] Placement and Programs

[6] Technology

[7] Professional Standards and Personnel Preparation

[8] Research

Conference of Educational Administrators of Schools and Programs for the Deaf

[a] Home

<http://www.ceasd.org/index.shtml>

[b] Accreditation

<http://www.ceasd.org/accred.shtml>

[bb] See accreditation guidelines [standards/indicators]

School Improvement through CEASD Accreditation: Self-Assessment Guidelines for

Schools Seeking Accreditation

[c] Standards [with indicators]

Standard 1: Philosophy, Mission, Beliefs, and/or Objectives

Standard 2: Governance and Leadership

Standard 3: Organizational Design and Staff

Standard 4: Educational Programs

Standard 5: Learning Media Services and Technology

Standard 6: Student Services

Standard 7: Student Life and Student Activities

Standard 8: Facilities

Standard 9: Health and Safety

Standard 10: Finances

Standard 11: Assessment of Student Learning

Standard 12: Planning

California

Programs for Deaf and Hard of Hearing: guidelines for Quality Standards

<http://www.cde.ca.gov/sp/ss/dh/documents/proguidlns.pdf>

[1] 34 standards

Colorado

Colorado Quality Standards: Programs and Services for Students Who are Deaf and Hard of Hearing

http://www.cde.state.co.us/cdesped/download/pdf/Colorado_Quality_Standards2004.pdf

[1] 36 standards

Appendix 2

List of school districts by region and school enrollment numbers needed to organize audiology services for hard of hearing children. CAPS and Bolded currently have an audiologist who provides audiology services.

Reference: School District data on web (05)

Region 1 = 13 districts

Number of Students

1-St. Maries	1100
2-Plummer/Worley	610
3-W. Bonner County	1550
4-Lake Pend Oreille	3960
5-Boundary Cou.	1670
6- <i>Charter</i>	130
7-Couer d 'Alene	9720
8- <i>Charter</i>	130
9-Lakeland	4330
10-Post Falls	5060
11-Kootenai	280
12-Kellogg	1420
13-Mullan	140
14-Wallace	560
15-Avery	20

Unserved: 20,960

Served: 9,720

Region 2 = 14 districts

1-Orofino	1380
2-Grangeville	1390
3-Cottonwood	440
4-Moscow	2440
5- <i>Charter</i>	130
6-Genessee	310
7-Kendrick	330
8-Potlach	560
9-Troy	320
10-Whitepine	250
11- <i>IDDL Charter</i>	620
12-Nez Perce	170
13-Kamiah	540
14-Highland	220
15-Lewiston	5040
16-Lapwai	630
17-Culdesac	200

Unserved: 14,980

Region 3 = 30 districts

1- Boise	25680
2- <i>Charter</i>	190
3- <i>Charter</i>	400
4-Merdian	28030
5- <i>Charter</i>	190
6- <i>Charter</i>	250

7-Kuna	3870
8-Meadows Valley	190
9-Council	300
10-Garden Valley	280
11-BaisivBasin (?)	470
12-Horseshoe BendHoreshoe Bend	310
13-Nampa	13150
14- <i>Charter</i>	390
15-Caldwell	5970
16-WildenWilder	470
17-Middleton	2620
18-Notus	300
19-Melba	1020
21-Vallivue	4830
22- <i>Charter</i>	230
23-Mtn. Home	4100
24-Emmett	3040
25-Marsing	790
26-Pleasant Valley	30
27-Bruneau-Grandview	470
28-Homedale	1310
29-Payette	1800
30-New Plymouth	920
31-Fruitland	1590
32-McCall-Donnelly	1010
33-Cascade	360
34-Weiser	1650
35-Cambridge	170
36-Midvale	140

Charter-	240
Charter-	1740
Charter-	250
Unserved: 83,740	
Served: 25, 680	
Region 4 = 22 districts	
1-Blaine C.	3190
2-Camas C.	170
3-Cassia C.	4950
4-Glenns Ferry	540
5-Gooding	1320
6-Wendell	1100
7-Hagerman	410
8-Bliss	190
9-Jerome	3290
10-Valley	670
11-Shoshone	600
12-Dietrich	170
13-Richfield	210
14-Minidoka	4120
15-Twin Falls	7020
16-Buhl	1300
17-Filer	1330
18-Kimberly	1330
19-Hansen	380
20-Three Creek El.	6
21-Castleford	330
22-Murtaugh	240

Unserved: 25,840

Served: 7,020

Region 5 = 14 districts

1-Pocatello	11800
2-Marsh V.	1350
3-Bear Lake	1300
4-Poc. Charter	180
5-Snake River	1880
6-Charter	140
7-Aberdeen	840
8-Grace	510
9-N. Gem	200
10-Soda Springs	970
11-Preston	2450
12-West Side	580
13-Oneida	900
14-American Falls	1620
15-Rockland	140
16-Arbon	7

Unserved: 12,220

Served: 11,800

Region 6 = 19 districts

1-Blackfoot	4190
2-Blackfoot Charter	80
3-Firth	830
4-Shelley	2080
5-IF	10250
6-Swan Valley	60

7-Bonneville	8030
8-Butte County	620
9-Clark County	240
10-Challis Joint	460
11-Mackay	230
12-Fremont	2400
13-Jefferson	3990
14-Ririe	690
15-W. Jefferson	690
16-Salmon	1060
17-S. Lemhi	110
18-Madison	4260
19-Sugar Salem	1340
20-Teton	1420
Unservd	
Unservd: 28,590	
Served	
Served: 14,440	
Regions 1-6	
Unservd: 185,490	
Served: 69,500	
Total: 254,990	

Appendix 3

Demographic Maps as of May 31, 2006

Statewide Signing Students' by Region (Birth to 12)

Signing Students by Region (Age 13-21)

Signing Students by Region (All Ages)

Figure 6: Statewide Auditory-Oral Implanted Students by Region (All Ages)

*Note, there are more implanted students in Idaho than the ones listed above, but the students included in the charts and tables above are those who use auditory-oral methods to communicate, not sign language.

Appendix 4

A School for the Deaf: An Essential Component of Idaho's Educational Offerings

April 27, 2007

Note:

We support family choice. Accordingly, readers should not misconstrue this paper in Appendix B to mean that we believe a school for the deaf is the 'right' or 'best' choice for all deaf and hard-of-hearing children. Rather, this paper was written at this time because the school for the deaf is the only placement option on Idaho's continuum that appears to face possible elimination.

To our knowledge, policymakers have not discussed eliminating other programs or placement options. Therefore, the potential threat to students who need a school for the deaf setting warrants attention and advocacy. Location of a school for the deaf and other logistical details were not within the scope of this paper.

We support policymakers in ensuring that adequate resources are provided for each of the five major student populations:

- 1. Signing deaf or nearly deaf students in local schools;*
- 2. Auditory-oral deaf students in specialized oral programs or local schools;*
- 3. Hard-of-hearing students in local schools needing speech and audiology services;*
- 4. Signing deaf or hard-of-hearing students in a specialized school for the deaf; and*
- 5. Multiply-disabled students in any of the above four settings.*

A School for the Deaf: An Essential Component of Idaho's Educational Offerings

Background

The Idaho State Board of Education and other policymakers are evaluating ways to improve education for deaf and hard-of-hearing students. We support efforts to ensure that students receive high quality education programs and services statewide.

Deaf and hard-of-hearing students have diverse educational needs. This paper outlines the needs of students who thrive in a specialized school for the deaf, and it explains why such a school is an essential component of Idaho's educational offerings.

Why Do We Need a School for the Deaf in Idaho?

Occasionally questions are raised concerning the value of a specialized school for the deaf. Such questions are based on genuine concern for the welfare of deaf and hard-of-hearing children. To appreciate the merits of a school for the deaf, one must understand deaf education in context. There are seven crucial reasons why Idaho should have a school for the deaf.

1. Federal law requires a full continuum of placement options. The Individuals with Disabilities Education Act (IDEA) requires states to ensure that a "continuum of alternative placements is available to meet the needs of children with disabilities for special education..." including "instruction in...special schools."²

Further, the law mandates that students be educated in the Least Restrictive Environment (LRE). The Secretary of the U.S. Department of Education issued an official Policy Guidance³ to clarify common misunderstandings about LRE in relation to deaf and hard-of-hearing students:

The Secretary is concerned that some public agencies have misapplied the LRE provision by presuming that placements in or closer to the regular classroom are required for children who are deaf, without taking into consideration the range of communication and related needs that must be addressed in order to provide appropriate services.... Any setting, including a regular classroom, that prevents a child who is deaf from receiving an appropriate education that meets his or her needs including communication needs is not the LRE for that individual child.... Any setting which does not meet the communication and related needs of a child who is deaf, and therefore does not allow for the provision of FAPE, cannot be considered the LRE for that child.... ...a center or special school may be the least restrictive environment in which the child's unique needs can be met. A full range of alternative placements as described at 34 CFR 300.551(a) and (b)(1) of the IDEA regulations must be available to the extent necessary to implement each child's IEP.

2. Students have access to free and unrestricted communication. Being the only signing deaf student in a local school can be extremely isolating because of communication barriers. Conversely, students in a school for the deaf have access to unrestricted communication because everyone uses a common language. Peer interactions are authentic because a third-party interpreter is not involved. Even if a student in a local school has a qualified interpreter, communication with teachers and peers can be unnatural, cumbersome, and invasive. Such a communication situation may be the *most* restrictive environment for some students.

What is more, a recent study sponsored by the Idaho Department of Education found that over 60% of Idaho's K-12 interpreters could not interpret 60% of the classroom information. This means that many Idaho students who desperately need the services of an interpreter scarcely have access to half of the information. On the other hand, students attending a school for the deaf do not face this problem because they receive instruction directly from teachers who communicate in their language.

3. Students receive direct instruction from certified teachers of the deaf. 'Mediated instruction' means receiving academic information through a third-party interpreter. In contrast, students receiving 'direct instruction' in a school for the deaf are taught without interference from a third party, i.e., they learn directly from a teacher. This way, students can focus on learning rather than trying to understand an interpreter who may or may not possess sufficient skills to effectively mediate communication. When designing an individualized education plan (IEP), the IDEA requires IEP teams to:

...consider the communication needs of the child, and in the case of a child who is deaf or hard of hearing, consider the child's language and communication needs, opportunities for direct communications with peers and professional personnel in the child's language and communication mode, academic level, and full range of needs, including opportunities for direct instruction in the child's language and communication mode.⁴

In addition to receiving direct instruction, students have access to a suite of professionals who can communicate with them, e.g., audiologists, speech and language pathologists, counselors.

4. Students are mentored by successful deaf and hard-of-hearing adult role models. Some deaf and hard-of-hearing children who are educated in local schools never meet a deaf or hard-of-hearing adult during their entire educational experience. This means that they have no exposure to individuals who have successfully navigated their way through life with similar challenges.

Hearing children are fortunate because they have access to adult mentors throughout their school years. Signing deaf or hard-of-hearing children who do not have regular interaction with signing deaf or hard-of-hearing adults are deprived of a rich opportunity to develop academically, socially, and emotionally.

A school for the deaf offers students an environment in which students can be mentored by adults who know how to guide them to become successful, productive citizens. Graduates often report that without the strong foundation they acquired while attending a school for the deaf, they never would have learned to function as a leader in society. This trend crosses all communication methodologies.

An increasing number of schools for the deaf are developing specialized programs to serve students with cochlear implants. Some parents enroll their children in a school for the deaf to give their child the 'best of both worlds' – a communication rich environment with hearing, deaf, and hard-of-hearing adult role models.

5. Students participate freely in extra-curricular activities. A great deal of ancillary learning occurs aurally. Many children who are deaf or hard of hearing do not learn aurally—they are visual learners by default. Because everyone in a school for the deaf has equal visual access to information, students participate in extra-curricular activities without communication barriers. Not surprisingly, a visual environment is the least restrictive environment for visual learners.

Imagine how awkward it may be for a signing deaf child in a local school to participate in a drama production or a basketball practice through an interpreter when everyone else is speaking and listening. Typically, signing deaf students who find themselves in a completely auditory environment eventually avoid situations where they are not able to freely participate. The consequence is tragic: they do not enjoy the same development experiences as their hearing peers—they become spectators in life rather than participants.

Schools for the deaf typically have athletics, drama, student government, and activities to augment students' academic learning experiences. These activities contribute to the development of adult citizens who participate in their communities at large. The value of a critical mass of students gaining access to this 'unwritten curriculum' without communication barriers cannot be underestimated.

6. A school for the deaf is a centralized information clearinghouse for local schools. A school for the deaf not only serves students on campus, but it also assists school districts that enroll deaf or hard-of-hearing students. Local schools often contact the school for the deaf for consultation, information, media materials, and technical assistance. The absence of an entity containing rich resources and expertise results in school districts being 'on their own' to figure out how to adequately serve this complex and expensive student population.

7. Idaho's large and rural geography creates a need for a central program. Idaho's rural geography and multiple school district education system make it impossible for all deaf and hard-of-hearing students to be effectively served in or

near their local schools. Some small towns are not able to recruit and retain qualified personnel who hold certifications to educate deaf and hard-of-hearing students. Additionally, some districts cannot afford the high costs of these professionals.

The presence of a critical mass of students is not only academically beneficial for students needing placement in a school for the deaf—it also has economic advantages. Economy of scale and scope must be a part of the discussion surrounding the education of deaf and hard-of-hearing students.

Conclusion

A school for the deaf provides students with unrestricted access to communication, direct instruction from certified teachers of the deaf, exposure to deaf and hard-of-hearing adult role models, and opportunities to freely participate in extracurricular activities. Local school districts also benefit from having a centralized clearinghouse of information and expertise at their disposal.

There is a reason that almost all states have at least one school for the deaf: it is the LRE for some students. IEP teams need access to a full spectrum of viable placement options. Without a school for the deaf, local schools would be expected to carry an enormous burden and IEP teams' placement choices would be compromised. Most importantly, the existence of a school for the deaf ensures that children needing such a placement option are not left behind.